

Straw Proposal for Implementing the NR 445 Revisions

◆ **Goals**

- Effectiveness (to ensure protection of public health)
- Efficiency (to recognize the impact on the internal and external workload)
- Equity (to ensure that sources are treated equally)
- Speed (to completely as quick as possible)
- Forward Thinking (to plan for future regular revisions)

◆ **Effective date of new emission standards**

Immediately

◆ **Date for **compliance demonstration**/certification of new standards**

For existing sources

3 years

For new or modified sources

Immediately

◆ **Effective date for new emission **inventory** reporting requirements**

1st full calendar year

◆ **Process to incorporate new standards and compliance requirements in **permits****

OPTIONS (for getting new standards and requirements into permits)

- At time of original issuance
- Reopen permits already issued:
 - At time of a modification
 - Due to newly promulgated MACT
 - Solely due to effort to revise NR 445
 - ...1. Required by NR 407.14(1)(b)
 - ...2. Desired to implement revisions quickly
- At time of permit renewal
- Construction permit
- Triggered by emission inventory reporting

Permit "status" at time revisions to NR 445 become effective	(1) Existing HAP No change in standard Threshold changes	(2) Existing HAP Standard changes Threshold changes	(3) New HAP New standard New threshold
Operation permit HAS BEEN issued			
Operation permit HAS NOT been issued, application on file			
No operation permit or application on file (These may become state only permits)			